

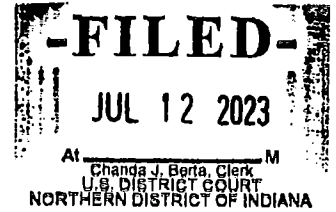
Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Division



Leon E. Andrews Jr

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Natalie Bokota, Kathleen A. Sullivan, Mark Watson, Patricia Hutton, Alex Fields, Joshua Brooks, Ian Fultz, G.E. Fields, T. Bronowski, G. Groarkin

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

2:23 CV 239

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Leon E. Andrews Jr.
 Address 1040 Clinton St.
Gary IN 46406
City State Zip Code
 County Lake
 Telephone Number (219) 949-0104
 E-Mail Address leonandrewsjr@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name Natalie Bokota
 Job or Title (if known) Judge
 Address 2293 N. Main St.
Crown Point IN 46307
City State Zip Code
 County Lake
 Telephone Number _____
 E-Mail Address (if known) _____
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name Kathleen A. Sullivan
 Job or Title (if known) Magistrate
 Address 2293 N. Main St.
Crown Point IN 46307
City State Zip Code
 County Lake
 Telephone Number _____
 E-Mail Address (if known) _____
☒ Individual capacity ☒ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Mark Watson
Magistrate
2243 N. Main St.
Crown Point IN 46307
City State Zip Code
Lake
☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Patricia Hutton
Administrative Assistant
2243 N. Main St.
Crown Point IN 46307
City State Zip Code
Lake
☒ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Deliberate Fabrication of Evidence, Civil Commitment

Unlawful Arrests, Due Process of Law, Excessive Force,
Interference with Parent/Child Relationship, Failure to Protect

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Name

Alex Fields

Job or Title (if known)

Booking Officer

Address

2293 N. Main St.
Crown Point
City

IN
State

46307
Zip Code

County

Lake

Telephone Number

E-Mail Address (if known)

☒ Individual capacity

☐ Official capacity

Defendant No. **6**

Name

Joshua Brooks

Job or Title (if known)

Correctional Officer

Address

2293 N. Main St.
Crown Point
City

IN
State

46307
Zip Code

County

Lake

Telephone Number

E-Mail Address (if known)

☒ Individual capacity

☐ Official capacity

Defendant No. 7

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Ian Foltz
Police Officer
7820 Broadway
Merrillville
City

Lake

IN
State

46410
Zip Code

☒ Individual capacity

☒ Official capacity

Defendant No. 8

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

G. E. Fields
Police Officer
7820 Broadway
Merrillville
City

Lake

IN
State

46410
Zip Code

☒ Individual capacity

☒ Official capacity

Defendant No. 9

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

T. Bronowski
Police Officer
7820 Broadway
Merrillville
IN

IN
State

46410
Zip Code

Lake

☒ Individual capacity ☐ Official capacity

Defendant No. 10

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

G. Groarkin
Police Officer
7820 Broadway
Merrillville
IN

IN
State

46410
Zip Code

Lake

☒ Individual capacity ☐ Official capacity

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

18 U.S. Code 241, 242, 245, 912, 1581, 1513, 1201, 1038

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

10 E 81st Ave, Merrillville, IN 46410 ; 2293 N. Main St. Crown Point IN 463

- B. What date and approximate time did the events giving rise to your claim(s) occur?

8-24-2022 (9:55 A.M.), 10-5-2022 (9:00 A.M.), 2-9-2023 (3:00 P.M.)

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

III. Statement of Claim

C. 8-24-2022 at 9:55 a.m. Ian Fultz, G.E. Fields, T. Bronowski, G. Groarkin, Unlawfully Arrested without giving due process of the law. I was not asked any questions at all, and my nine-year-old daughter was unlawfully taken from my custody.

10-5-2023 at 9:00 a.m. I was unlawfully detained in the courtroom and transported to the jail. In the booking area I was threatened by Alex Fields who said that "you won't get out of here I promise". I did not get out as promised when my seven-day sentence was completed because of whatever was submitted into the computer system by Alex Fields.

2-9-2023 at 3:00 p.m. I was unlawfully detained and set to be released from another seven-day sentence which I was released from the court at 9:00 a.m. but still in custody when Joshua Brooks and six to seven other Correctional Officers assaulted me for asking to speak with a supervisor because they were using the fact that I did not fingerprint when I was brought in to the jail as a way to retaliate against me for the lawsuit I put Alex Fields on notice about in October 2022.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Lumps, bumps, Abrasions, and cuts on my head and wrists. Neck pain, back pain, and an injury to my right wrist affecting my nerves.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Emotional distress for my daughter, myself, and family, 10m.ill.
Pain & Suffering for my daughter, myself, and family, 10m.illia.
Defamation of Character for myself and family, 10 million

30 million dollars

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7-12-2023

Signature of Plaintiff

Printed Name of Plaintiff

Leon E. Andrews Jr.
Leon E. Andrews Jr.

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address